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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,

No. 3:24-CR-00342-SI-4

PLAINTIFF,

v.

**DECLARATION OF COUNSEL
IN SUPPORT OF MOTION TO
CONTINUE TRIAL**

JACKSON REVES,

DEFENDANT.

Counsel for the defendant, Erik E. Eklund, offers this declaration in support of a Motion to Continue. Under penalty of perjury, counsel certifies that the following facts are true and correct to the best of counsel's belief:

1. Defendant Jackson Reves made his first appearance in this matter on October 24, 2024. Mr. Reves is being held in the custody of the United States Marshals.
2. On October 4, 2024, I was appointed to represent Mr. Reves in the above-captioned case, pursuant to the Criminal Justice Act.

3. The government has produced over 100,000 pages of discovery related to this matter, and based on conversations I have recently had with counsel for the government, I anticipate further productions.
4. This is my fourth request for a continuance of the trial date.
5. I have advised Mr. Reves of his rights under the Speedy Trial Act, 18 U.S.C. §3171. He understands that counsel needs more time to review discovery and investigate the facts of the case, and agrees that the period of time ending thirty days after the proposed trial date constitutes excludable delay.
6. On September 4, 2025, AUSA Parakram Singh advised me and counsel for co-defendants in a virtual meeting that he has no objection to the continuance requested.

DATED September 11, 2025.

s/ Erik E. Eklund
Erik E. Eklund
Attorney for Defendant